

EXHIBIT 2

In the Matter of:

FTC v. Jason Cardiff, et al.

March 29, 2019

Jason Cardiff

Condensed Transcript with Word Index



For The Record, Inc.
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<p>1 UNITED STATES DISTRICT COURT 2 CENTRAL DISTRICT OF CALIFORNIA 3 4 5 FEDERAL TRADE COMMISSION,)Case No. 6 Plaintiff,)ED 5:18-cv-02104-SJO-PLAx 7 v.) 8 JASON CARDIFF, ET AL.,) 9 Defendants.) 10 11 12 13 Friday, March 29, 2019 14 15 300 North Los Angeles Street 16 Seventh Floor 17 Los Angeles, California 18 19 20 The above-entitled matter came on for 21 deposition, pursuant to notice, at 10:10 a.m. 22 23 24 25</p>	<p>3 1 APPEARANCES: 2 3 For the Federal U.S. FEDERAL TRADE COMMISSION Trade Commission: ELIZABETH SANGER, ESQ. 4 600 Pennsylvania Avenue NW Mail Drop CC-10528 5 Washington, DC 20580 (202) 326-2757 6 esanger@ftc.gov 7 8 For the Federal U.S. FEDERAL TRADE COMMISSION Trade Commission: EDWIN RODRIGUEZ, ESQ. 9 600 Pennsylvania Avenue NW Mail Drop CC-10528 10 Washington, DC 20580 (202) 326-3147 erodriguez@ftc.gov 11 12 For the Federal U.S. FEDERAL TRADE COMMISSION Trade Commission: ROBERT J. QUIGLEY 13 10990 Wilshire Boulevard Suite 400 14 Los Angeles, California 90024 (310) 824-4334 15 rquigley@ftc.gov 16 17 For the Witness: LAW OFFICE OF JAMES D. WHITE JAMES D. WHITE 18 303 Broadway Street Suite 1044 19 Laguna Beach, California 92651 (949) 697-9236 jdw@jamesdwhitelaw.com 20 21 22 23 Also Present: 24 MATTHEW HAUSLE, Videographer 25</p>
<p>2 1 UNITED STATES DISTRICT COURT 2 CENTRAL DISTRICT OF CALIFORNIA 3 4 5 FEDERAL TRADE COMMISSION,)Case No. 6 Plaintiff,)ED 5:18-cv-02104-SJO-PLAx 7 v.) 8 JASON CARDIFF, ET AL.,) 9 Defendants.) 10 11 12 13 14 15 Videotaped deposition of JASON EDWARD THOMAS 16 CARDIFF, taken on behalf of the Federal Trade 17 Commission, at 300 North Los Angeles Street, 18 Seventh Floor, Los Angeles, California, commencing at 19 10:10 a.m., and concluding at 3:36 p.m., on Friday, 20 March 29, 2019, pursuant to Notice, before 21 Kimberly Cathey, CSR No. 10701, a Certified Shorthand 22 Reporter, in and for the State of California. 23 24 25</p>	<p>4 1 I N D E X 2 3 WITNESS EXAMINATION PAGE 4 JASON EDWARD THOMAS CARDIFF By Ms. Sanger 9 5 6 7 8 EXHIBITS DESCRIPTION FOR ID 9 10 Exhibit 1 Ex Parte Temporary Restraining Order with Asset Freeze, Appointment of a Temporary Receiver, and Other Equitable Relief, and Order to Show Cause Why a Preliminary Injunction Should Not Issue 14 11 12 13 Exhibit 2 Proposed Preliminary Injunction with Asset Freeze, Receiver, and Other Equitable Relief Against Jason Cardiff and Eunjung Cardiff 17 14 15 16 Exhibit 3 Federal Trade Commission Financial Statement of Individual Defendant 22 17 18 Exhibit 4 Friday, April 13, 2018, E-mail 34 19 Exhibit 5 Monday, 4/9/2018, E-mail 35 20 Exhibit 6 Personal Items List 51 21 Exhibit 7 State of California Secretary of State Statement of Information 58 22 23 Exhibit 8 Friday, 10/31/2014, E-mail 62 24 Exhibit 9 Friday, 12/16/2016, E-mail 65 25 Exhibit 10 Directive from the Trustee 67</p>

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3	Exhibit 28	Proforma Invoice Dated	105	3	THE VIDEOGRAPHER: Good morning.		
4		September 29, 2018		4	We're on the video record beginning at Media		
5	Exhibit 29	Proforma Invoice Dated	106	5	Number 1 in the deposition of Jason Cardiff,		
6		October 2, 2018		6	testifying in the matter of Federal Trade Commission		
7	Exhibit 30	A1-Application to Incorporate	108	7	vs. Jason Cardiff, Case Number ED 5:18-cv-02104-		
8		a Company		8	SJO-PLA, filed in the United States District Court,		
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10		Power of Attorney for Customs		10	The time is 10:10 a.m. on March 29, 2019.		
11		and Forwarding Agent		11	My name is Matthew Hausle, and I'm the		
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13				13	Kim Cathey. We are from Maxene Weinberg Agency.		
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21	Exhibit 37	Promissory Note	123	21	Commission.		
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9

1 JASON EDWARD THOMAS CARDIFF,
2 called as a witness by and on behalf of the Federal
3 Trade Commission, was duly sworn.

4 EXAMINATION

5 BY MS. SANGER:

6 **Q Good morning.**

7 **My name is Elizabeth Sanger, and I represent**
8 **the Federal Trade Commission.**

9 **Mr. Cardiff, because your attorney has**
10 **informed me that you'll be invoking the Fifth**
11 **Amendment in response to my questions today, I'm going**
12 **to abbreviate my instructive remarks with respect to**
13 **the ground rules for the deposition, but there are a**
14 **few things that I want to make sure that you**
15 **understand.**

16 **Please give verbal responses to any question**
17 **you answer, because the court reporter cannot record**
18 **nonverbal responses for the transcript.**

19 **Please speak clearly and try not to speak too**
20 **fast. If either one of us is speaking too fast, I**
21 **have asked the court reporter to request that we slow**
22 **down.**

23 **Your testimony today will be given under**
24 **oath. The oath that was just administered to you is**
25 **the same oath as if you were testifying in a court of**

10

1 **law under penalty of perjury.**

2 **Do you understand that?**

3 A Yes.

4 **Q Is there any reason, other than your decision**
5 **to invoke the Fifth Amendment today, such as any**
6 **medication that you are taking, that would prevent you**
7 **from giving truthful and complete testimony today?**

8 A No.

9 **Q It's important that you understand my**
10 **questions. If at any point you don't understand what**
11 **I'm asking you, please ask me to repeat the question**
12 **or to clarify.**

13 **Do you understand that?**

14 A Yes.

15 **Q And please wait for me to finish questions**
16 **before you start answering.**

17 **Please let me know if you need to take a**
18 **break, and I will do my best to accommodate you after**
19 **you have answered any pending question.**

20 **Does that make sense to you?**

21 A Yes.

22 **Q Okay. I would like to talk about your**
23 **preparation for the deposition today.**

24 **Did you talk to anyone, other than your**
25 **attorney, to prepare for the deposition today?**

11

1 MR. WHITE: Ms. Sanger, I'd like you to have
2 the witness identify himself for the record.

3 MS. SANGER: Oh, sure.

4 MR. WHITE: And from that -- and from that
5 moment forward, the response will be uniform that he
6 will assert his Fifth Amendment privilege.

7 I'd like you to identify for the record all
8 the participants today. I'd like you to specifically
9 identify for the record whether anyone is -- has
10 dialed in on the telephone, as did happen yesterday.

11 And I'd like you to also assert, as I asked
12 yesterday, that the videography that's being recorded
13 is not being live fed anywhere else outside this room.

14 Can you accommodate me, ma'am?

15 MS. SANGER: Yes.

16 MR. WHITE: Thank you.

17 MS. SANGER: And I didn't start writing down
18 the requests until it was too late. Happy to
19 accommodate, and please remind me if I neglect.

20 BY MS. SANGER:

21 **Q Mr. Cardiff, could you please state your full**
22 **name for the record.**

23 A Jason Edward Thomas Cardiff.

24 MS. SANGER: And I will begin by introducing
25 who's here on behalf of the Federal Trade Commission.

12

1 I'm Elizabeth Sanger, an attorney at the
2 Federal Trade Commission, and I'm joined today by two
3 other attorneys for the Federal Trade Commission,
4 Edwin Rodriguez and Robert Quigley.

5 And there is no one dialed into the phone,
6 and the video that's being recorded today is not a
7 live feed.

8 MR. WHITE: Very well. Thank you.

9 MS. SANGER: And so it's clear for the
10 record, we've stipulated to this agreement about the
11 format of Mr. Cardiff's responses, and I understand
12 your preview of how the day will go.

13 MR. WHITE: I think perhaps the best way to
14 do that is simply reference the fact that at the
15 commencement of yesterday's deposition of
16 Eunjung Cardiff, we put on the record certain
17 statements that I made, certain statements that Edwin
18 made, and that those prefatory comments from yesterday
19 should simply be incorporated by reference into this
20 proceeding.

21 Not necessarily that the court reporter has
22 to go find them and incorporate them; but when the day
23 comes, that which was said yesterday is deemed said
24 today in that same manner, if that's suitable to you.

25 MS. SANGER: That's agreeable to me.

13

1 MR. WHITE: Thank you.

2 BY MS. SANGER:

3 **Q Mr. Cardiff, in asserting the Fifth Amendment**
4 **privilege today, I want to make sure that you**
5 **understand that the FTC reserves all rights to**
6 **challenge your assertion of the Fifth Amendment**
7 **privilege.**

8 **If you choose to assert the Fifth Amendment**
9 **in response to a question, the FTC can ask the judge**
10 **to draw a negative inference based on your refusal to**
11 **answer or ask the judge to preclude you from**
12 **presenting evidence in the future that would have been**
13 **responsive to the question.**

14 **This could negatively affect your ability to**
15 **mount an effective defense in this lawsuit. The FTC**
16 **reserves its right to do these things.**

17 **Do you understand?**

18 MR. WHITE: I acknowledge your admonition.
19 We can proceed without asking for a response from the
20 witness.

21 MS. SANGER: Okay.

22 MR. WHITE: Thank you.

23 BY MS. SANGER:

24 **Q Mr. Cardiff, on October 12th, 2018, you were**
25 **personally served with a copy of the Temporary**

14

1 **Restraining Order entered in this case by Judge Otero,**
2 **weren't you?**

3 A I'm invoking my Fifth Amendment privilege.
4 (Exhibit 1 marked.)

5 BY MS. SANGER:

6 **Q Mr. Cardiff, I'm handing you a document that**
7 **has been labeled Exhibit 1. The document up at the**
8 **top has a Document Number 29, and I'll represent for**
9 **the record that this was the Temporary Restraining**
10 **Order entered in this case on October 10th, 2018.**

11 **Mr. Cardiff, have you seen this document**
12 **before?**

13 A I'm invoking my Fifth Amendment privilege.

14 **Q You met with the receiver on October 12th and**
15 **discussed this Temporary Restraining Order; isn't that**
16 **correct?**

17 A I'm invoking my Fifth Amendment privilege.

18 **Q During your initial meeting with the receiver**
19 **on October 12th, Attorney Tracy Green joined you by**
20 **phone; is that right?**

21 A I'm invoking my Fifth Amendment privilege.

22 **Q The receiver told you that your personal**
23 **assets were frozen; correct?**

24 A I'm invoking my Fifth Amendment privilege.

25 **Q The receiver told you that the assets of the**

15

1 **other named defendants, which you can find on page 2**
2 **of Exhibit 1, were also frozen; correct?**

3 A I'm invoking my Fifth Amendment privilege.

4 **Q The receiver asked you to turn over the**
5 **jewelry, artwork, and handbags listed in this**
6 **Temporary Restraining Order; is that correct?**

7 A I'm invoking my Fifth Amendment privilege.

8 MR. WHITE: Counsel, for my edification,
9 could you point out the particular language where the
10 items are specifically listed?

11 MS. SANGER: Yes.

12 MR. WHITE: Just so I can follow along.

13 MS. SANGER: I'm looking --

14 MR. WHITE: Never mind. I found it.

15 MS. SANGER: Oh. I'm looking at page 20 of
16 37, for the benefit of the record --

17 MR. WHITE: I found it. Thank you.

18 Go ahead.

19 MS. SANGER: -- and beginning on line 13.

20 BY MS. SANGER:

21 **Q Mr. Cardiff, I would like to direct your**
22 **attention to a specific item in this list.**

23 **If you will turn to page 21 of 37, the**
24 **numbered item is Number 25; the line number is 27.**

25 **In regard to the item identified as a diamond**

16

1 **ring worth \$532,000, you claimed that you had sold the**
2 **ring in Abu Dhabi; isn't that right?**

3 A I'm invoking my Fifth Amendment privilege.

4 **Q Did you provide Julie Green with a copy of**
5 **this Temporary Restraining Order?**

6 A I'm invoking my Fifth Amendment privilege.

7 **Q Did you provide Gus Navarro with a copy of**
8 **this Temporary Restraining Order?**

9 A I'm invoking my Fifth Amendment privilege.

10 **Q Did you provide any other Redwood Scientific**
11 **employee with a copy of this Temporary Restraining**
12 **Order?**

13 A I'm invoking my Fifth Amendment privilege.

14 **Q Did you provide the Temporary Restraining**
15 **Order to anyone else who worked in the office at**
16 **820 North Mountain Avenue, Suite 100, in Upland,**
17 **California?**

18 A I'm invoking my Fifth Amendment privilege.

19 **Q Did you provide the Temporary Restraining**
20 **Order to anyone else who worked in the office at**
21 **870 North Mountain Avenue, Suite 115, in Upland,**
22 **California?**

23 A I'm invoking my Fifth Amendment privilege.

24 **Q Did you provide the Temporary Restraining**
25 **Order to anyone else who worked in the office at**

17

1 **870 North Mountain Avenue, Suite 118, in Upland,**
2 **California?**

3 A I'm invoking my Fifth Amendment privilege.

4 MR. WHITE: Counsel, for my edification, is
5 there something in this document that required him to
6 do -- to provide this document to anyone else? Just
7 for my edification to try to move things along, and
8 I'm asking this simply as a matter of courtesy.

9 MS. SANGER: So there are certain provisions
10 throughout the order that require defendants to give
11 notice to certain people that may be acting in concert
12 with them.

13 MR. WHITE: Okay.

14 MS. SANGER: And that's what I'm getting at.

15 MR. WHITE: All right. So that language is
16 here somewhere?

17 MS. SANGER: Yes.

18 MR. WHITE: We'll find it later. Thank you.
19 (Exhibit 2 marked.)

20 BY MS. SANGER:

21 **Q Mr. Cardiff, I'm handing you a document that**
22 **has been marked Exhibit 2.**

23 MR. WHITE: Take that and lay it facedown;
24 that way when they come up, they'll be in the right
25 order for our reporter. We will then be able to know

18

1 that she has a full package on her way out the door;
2 otherwise, we all get locked in for the night.

3 MS. SANGER: I'll represent for the record
4 that the top of this document has a Document Number
5 59, and that this is the "Preliminary Injunction with
6 Asset Freeze, Receiver, and Other Equitable Relief
7 Against Jason Cardiff and Eunjung Cardiff." This
8 order was entered on November 8th, 2018.

9 BY MS. SANGER:

10 **Q Mr. Cardiff, did you receive a copy of this**
11 **preliminary injunction?**

12 A I'm invoking my Fifth Amendment privilege.

13 **Q Did you receive a copy of a similar**
14 **preliminary injunction as to the corporate defendants**
15 **named in this lawsuit?**

16 MR. WHITE: Vague as to "similar."

17 BY MS. SANGER:

18 **Q Did you receive a copy of a preliminary**
19 **injunction as to the corporate defendants in this**
20 **lawsuit?**

21 A I'm invoking my Fifth Amendment privilege.

22 **Q Did you provide a copy of this preliminary**
23 **injunction marked Docket 46 to Julie Green?**

24 A I'm invoking my Fifth Amendment privilege.

25 **Q Did you provide a copy of this document to**

19

1 **Gus Navarro?**

2 A I'm invoking my Fifth Amendment privilege.

3 **Q Did you provide a copy of this document to**
4 **any of your other employees?**

5 A I'm invoking my Fifth Amendment privilege.

6 **Q Did you provide a copy of this order to**
7 **anyone else?**

8 A I'm invoking my Fifth Amendment privilege.

9 Excuse me. Can we --

10 MS. SANGER: I may have -- I may have
11 referenced this as Docket 46, and I just want to
12 correct for the record that I was speaking about
13 Docket Number 59.

14 MR. WHITE: I wrote it as 52. So where 46
15 came from, who knows.

16 THE WITNESS: I --

17 MR. WHITE: But my witness has a question --

18 MS. SANGER: Okay.

19 MR. WHITE: -- to ask.

20 I'd like you to remove your mike. I'm going
21 to take mine off and find out what his question is.

22 MS. SANGER: Okay.

23 MR. WHITE: He seems to be wanting to ask you
24 something, but I don't want to get that pattern
25 established.

20

1 MS. SANGER: Okay.

2 THE VIDEOGRAPHER: Do you want to go off the
3 record?

4 MS. SANGER: Yeah. We can go off the record.

5 MR. WHITE: Thank you.

6 THE VIDEOGRAPHER: The time is 10:23 a.m.
7 We're going off the record.

8 (Recess.)

9 THE VIDEOGRAPHER: The time is 10:25 a.m.
10 We're back on the record.

11 BY MS. SANGER:

12 **Q Mr. Cardiff, before we took a break, we were**
13 **speaking about two different preliminary injunctions**
14 **that were entered in this lawsuit; one against the**
15 **corporate defendants, and one against you and your**
16 **wife.**

17 **Did you attend the preliminary injunction**
18 **hearing on November 7th, 2018?**

19 MR. WHITE: Actually, Counsel, before we took
20 the break, I think we were trying to clear up the
21 identification of what you've marked as Exhibit 2, as,
22 in particular, whether it was from the court docket as
23 Docket Number 46, 52, or 59. I think that's where we
24 took the break.

25 MS. SANGER: Okay. Exhibit Number 2 is

21

1 Docket Number 59. It is the preliminary injunction as
2 to Jason Cardiff and Eunjung Cardiff.

3 I also made oral reference to Docket 46,
4 which is the preliminary injunction as to the
5 corporate defendants, which was issued on
6 October 24th, 2018.

7 I'm now going to be focusing on the hearing
8 that led to the issuance of the preliminary injunction
9 as to Jason Cardiff and Eunjung Cardiff.

10 MR. WHITE: Which is Exhibit 2.

11 MS. SANGER: Correct.

12 MR. WHITE: Thank you.

13 BY MS. SANGER:

14 **Q So I'll repeat my question, Mr. Cardiff.**

15 **Did you attend the preliminary injunction**
16 **hearing on November 7th, 2018?**

17 A I'm invoking my Fifth Amendment privilege.

18 **Q You personally spoke to Judge Otero at the**
19 **hearing, didn't you?**

20 A I'm invoking my Fifth Amendment privilege.

21 **Q Did you hear me describe the FTC's proposed**
22 **preliminary injunction in court that day?**

23 A I'm invoking my Fifth Amendment privilege.

24 **Q The Court told you it had significant**
25 **concerns that you had not been complying with the**

22

1 **Temporary Restraining Order; correct?**

2 A I'm invoking my Fifth Amendment privilege.

3 **Q The Court informed you that there are**
4 **significant consequences that could be imposed if you**
5 **are in violation of the Court's orders going forward**
6 **and admonished you to make all reasonable efforts to**
7 **comply; isn't that right?**

8 A I'm invoking my Fifth Amendment privilege.

9 **Q Didn't you tell Judge Otero that you**
10 **understood his instructions?**

11 A I'm invoking my Fifth Amendment privilege.

12 **Q Did you provide a copy of the preliminary**
13 **injunction, which is Exhibit 2, issued on**
14 **November 8th, 2018, to Julie Green?**

15 A I'm invoking my Fifth Amendment privilege.

16 **Q Did you provide a copy of the preliminary**
17 **injunction, which is Exhibit 2, to Gus Navarro?**

18 A I'm invoking my Fifth Amendment privilege.

19 **Q Did you provide that preliminary injunction**
20 **to any of your other employees?**

21 A I'm invoking my Fifth Amendment privilege.

22 **Q Did you provide a copy of the preliminary**
23 **injunction to anyone else?**

24 A I'm invoking my Fifth Amendment privilege.
25 (Exhibit 3 marked.)

23

1 BY MS. SANGER:

2 **Q Mr. Cardiff, I've just handed you a document**
3 **that has been marked Exhibit 3. I'll note for the**
4 **record that the title of the document as listed in the**
5 **footer is "Federal Trade Commission Financial**
6 **Statement of Individual Defendant."**

7 **If you turn to page 10 of 10, I will note for**
8 **the record that the date on the signature page is**
9 **October 25th, 2018.**

10 **Mr. Cardiff, did you submit this document to**
11 **the FTC? And when I say "FTC," I mean Federal Trade**
12 **Commission.**

13 A I'm invoking my Fifth Amendment privilege.

14 **Q Mr. Cardiff, looking at page 10 of 10, is**
15 **this your signature?**

16 A I'm invoking my Fifth Amendment privilege.

17 **Q Did you complete this form, or did someone**
18 **else?**

19 A I'm invoking my Fifth Amendment privilege.

20 **Q Mr. Cardiff, let's turn to page 1 of**
21 **Exhibit 3. I'm looking at the box titled "Item 1.**
22 **Information About You." Under "Full Name" it says**
23 **"Jason Edward Thomas Cardiff."**

24 **Have you ever gone by the name "Edward"?**

25 A I'm invoking my Fifth Amendment privilege.

24

1 **Q Have you ever gone by the name "Thomas"?**

2 A I'm invoking my Fifth Amendment privilege.

3 **Q Have you ever gone by the name "Edward**
4 **Thomas"?**

5 A I'm invoking my Fifth Amendment privilege.

6 **Q Please turn to page 2.**

7 **Let's look at Item Number 6, "Employment**
8 **Information/Employment Income." Listed on this form**
9 **under "Company Name and Address" are two entities.**
10 **The first is "Redwood Scientific Technologies"; the**
11 **second is "People United for Christians." There are**
12 **no other entries on the page.**

13 **Mr. Cardiff, looking at the entry for**
14 **"Redwood Scientific Technologies," it says "Positions**
15 **Held Chief Executive," and underneath it says**
16 **"Former."**

17 **Are you the chief executive of Redwood**
18 **Scientific Technologies?**

19 A I'm invoking my Fifth Amendment privilege.

20 **Q In that same entry in the column marked**
21 **"Income Received: Year to Date plus 5 Prior Years,"**
22 **under "2014" it says "0"; under "2015" it says**
23 **"35,000"; under "2016" it says "65,000"; under "2017"**
24 **it says "65,000"; under "2018" it says "60,000" and**
25 **"25,000."**

25

1 Was this the amount of income you received
2 from your employment with Redwood Scientific
3 Technologies during the years written on this chart?

4 A I'm invoking my Fifth Amendment privilege.

5 Q Let's look at the second entry, "People
6 United for Christians." Under "Positions Held" it
7 reads "Head Pastor."

8 Are you the head pastor of People United for
9 Christians?

10 A I'm invoking my Fifth Amendment privilege.

11 Q In the "Income" box under year "2014" it
12 reads "250,000"; in "2015," "350,000"; in "2016,"
13 "200,000"; in "2017," "200,000"; in "2018," "150,000."

14 Did you earn \$150,000 from People United for
15 Christians in 2018?

16 A I'm invoking my Fifth Amendment privilege.

17 Q Going forward --

18 A Just a minute. Sorry. I have a question.

19 MR. WHITE: Okay. May we, Counsel, take a
20 break?

21 MS. SANGER: Sure.

22 THE VIDEOGRAPHER: The time is 10:32 a.m.
23 We're going off the record.

24 (Recess.)

25 THE VIDEOGRAPHER: The time is 10:34 a.m.

26

1 We're back on the record.

2 MR. WHITE: Ms. Sanger, I'd like your
3 permission to assert additional privileges as it
4 relates to questions that relate to religious church
5 matters; in particular, you're including -- and in
6 particular, your questions about this entity, People
7 United for Christians.

8 We believe that there are other
9 constitutional privileges and protections which would
10 be applicable.

11 And thus with your permission, I'd like to
12 simply amend his response to those questions by simply
13 adding "and all other constitutionally protected
14 rights," particularly the concept of separation of
15 church and state.

16 If you would permit me to offer that as a
17 supplement to his response and agree that going
18 forward, when he asserts his Fifth Amendment
19 privilege, it will be deemed to include the religious
20 protection privileges under the constitution so we
21 don't have to enlarge his -- his brief response.

22 So how would you like to do that?

23 MS. SANGER: Can you just clarify for me,
24 Mr. White, whether these additional privileges that he
25 may assert, he would be choosing not to answer based

27

1 both on the Fifth Amendment privilege and potentially
2 other privileges at your instruction?

3 MR. WHITE: Yes. Predicated on the same
4 record we made yesterday at the commencement of
5 Eunjung's deposition, which included --

6 MS. SANGER: Okay.

7 MR. WHITE: -- my request to you to postpone
8 this for 30 days so that he could -- he and she could
9 have the benefit of criminal counsel. As I explained
10 yesterday, I'm a civil business litigation attorney.

11 MS. SANGER: I just wanted to clarify if this
12 additional assertion was also an instruction from you
13 not to answer.

14 MR. WHITE: Yes.

15 MS. SANGER: Since it's in addition to what
16 we had talked about.

17 MR. WHITE: Yes. Fine. If you can accept
18 that, then we can move on and deem your questions that
19 have already been asked about the religious thing to
20 include that response and deem them to include that in
21 the future response if we continue to use the
22 shorthand version of the Fifth Amendment without
23 necessarily saying "and all other constitutionally
24 protected rights and privileges."

25 MS. SANGER: That works for me.

28

1 MR. WHITE: All right. Thank you.

2 MS. SANGER: And so we will obviously reserve
3 our own rights to challenge any assertions that may be
4 made in the future.

5 MR. WHITE: Not a question. Not a doubt.
6 I look forward to it.

7 BY MS. SANGER:

8 Q Mr. Cardiff, did you earn \$200,000 from
9 People United for Christians in 2017?

10 A I'm asserting my Fifth Amendment privilege.

11 Q Did you ever --

12 MR. WHITE: And -- and -- and it should be
13 deemed henceforth to include any other
14 constitutionally protected right or privilege.

15 MS. SANGER: Correct.

16 MR. WHITE: We agree?

17 MS. SANGER: Per our agreement.

18 MR. WHITE: Wonderful. Thank you.

19 BY MS. SANGER:

20 Q Did you earn \$200,000 from People United
21 from -- People United for Christians in 2016?

22 A I'm asserting my Fifth Amendment privilege.

23 Q In 2015 did you earn \$350,000 from People
24 United for Christians?

25 A I'm asserting my Fifth Amendment privilege.

29

1 **Q Did you pay income taxes on this income from**
2 **Redwood Scientific Technologies and People United for**
3 **Christians in 2018?**
4 MR. WHITE: Objection. Compound.
5 BY MS. SANGER:
6 **Q Did you pay income taxes on your income from**
7 **Redwood Scientific Technologies in 2018?**
8 MR. WHITE: Objection. Privacy.
9 BY MS. SANGER:
10 **Q You can answer.**
11 A I'm asserting my Fifth Amendment privilege.
12 **Q Did you pay income taxes on your income from**
13 **Redwood Scientific Technologies in 2017?**
14 MR. WHITE: Same objection.
15 MS. SANGER: And we can agree it will be a
16 standing objection.
17 MR. WHITE: Thank you.
18 THE WITNESS: I'm asserting my Fifth
19 Amendment privilege.
20 BY MS. SANGER:
21 **Q Did you pay income taxes on your Redwood**
22 **Scientific Technologies income in 2016?**
23 MR. WHITE: Same objection.
24 THE WITNESS: I'm asserting my Fifth
25 Amendment privilege.

30

1 BY MS. SANGER:
2 **Q Did you pay income taxes on your Redwood**
3 **Scientific Technologies income in 2015?**
4 A I'm asserting --
5 MR. WHITE: Same objection.
6 THE WITNESS: I'm asserting my Fifth
7 Amendment privilege.
8 BY MS. SANGER:
9 **Q Did you pay income taxes on your People**
10 **United for Christians income in 2018?**
11 MR. WHITE: Same objections.
12 THE WITNESS: I'm asserting my Fifth
13 Amendment privilege.
14 MS. SANGER: Mr. White, for the benefit of
15 efficiency, I'm going to ask about years 2017,
16 2016, and 2015. I would be amenable to accepting
17 your objection in advance for those following
18 questions.
19 MR. WHITE: And I greatly appreciate your
20 offer, and I accept your offer.
21 BY MS. SANGER:
22 **Q Mr. Cardiff, did you pay income taxes on your**
23 **People United for Christian income in 2017?**
24 A I'm asserting my Fifth Amendment privilege.
25 **Q Did you pay income taxes on your People**

31

1 **United for Christians income in 2016?**
2 A I'm asserting my Fifth Amendment privilege.
3 **Q Did you pay income taxes on your People**
4 **United for Christians income in 2015?**
5 A I'm asserting my Fifth Amendment privilege.
6 **Q Did you file a federal income tax return for**
7 **2018?**
8 A I'm asserting my Fifth Amendment privilege.
9 **Q Did you file a federal income tax return for**
10 **2017?**
11 A I'm asserting my Fifth Amendment privilege.
12 **Q Did you file a federal income tax return for**
13 **2016?**
14 A I'm asserting my Fifth Amendment privilege.
15 **Q Did you file a federal income tax return for**
16 **2015?**
17 A I'm asserting my Fifth Amendment privilege.
18 **Q Did you file for an extension on your taxes**
19 **for the tax year 2018?**
20 A I'm asserting my Fifth Amendment privilege.
21 **Q Did you file for an extension on your taxes**
22 **in 2017?**
23 A I'm asserting my Fifth Amendment privilege.
24 **Q Did you file for an extension on your taxes**
25 **in 2016?**

32

1 A I'm asserting my Fifth Amendment privilege.
2 **Q Did you file for an extension on your taxes**
3 **in 2015?**
4 A I'm asserting my Fifth Amendment privilege.
5 **Q Who, other than you, would know if you had**
6 **filed taxes for the years -- for the year 2018?**
7 A I'm asserting my Fifth Amendment privilege.
8 **Q Do you have an accountant?**
9 A I'm asserting my Fifth Amendment privilege.
10 **Q Who, other than you, would know if you had**
11 **filed taxes in the year 2017?**
12 A I'm asserting my Fifth Amendment privilege.
13 MR. WHITE: Are we going to a different topic
14 now?
15 Just to be clear, I withheld making separate
16 objections, and I believe I understood what we entered
17 into as an arrangement and agreement was that I
18 wouldn't need to make separate objections. You were
19 accepting them and deeming them having been made, just
20 so I'm clear.
21 MS. SANGER: Correct.
22 MR. WHITE: Very well. Thank you kindly.
23 MS. SANGER: And now we'll hit the reset
24 button.
25 MR. WHITE: I like that button.